

[Parties and Counsel Listed on Signature Pages]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

**IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION**

MDL No. 3047

Case No. 4:22-md-03047-YGR

This Document Relates to:

ALL NON-BELLWETHER SCHOOL DISTRICT
CASES

~~[PROPOSED]~~ **STIPULATION AND
ORDER RE: LOCAL GOVERNMENT
AND SCHOOL DISTRICT
BELLWETHER PLAINTIFFS’
SUPPLEMENTAL INITIAL
DISCLOSURE STATEMENT
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 26(A)(1)(A)(iii)**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

WHEREAS, after hearing arguments from both sides at a Discovery Management Conference on September 12, 2024 (“DMC”), the Court ordered that the Non-Bellwether Local Government and School District Plaintiffs (“Non-BW LGE/SDs”) begin a rolling production on February 10, 2025 of supplemental Rule 26(a)(1)(A)(iii) disclosures of past property damages and past increased hiring costs (Tr. at 41:2).

WHEREAS, the parties, having met and conferred following the DMC, hereby stipulate to the following rolling production of supplemental Rule 26(a)(1)(A)(iii) disclosures of past property damages and past increased hiring costs by the Non-BW LGE/SDs whose cases are on file as of the date of the entry of this Order.¹

¹ Plaintiffs’ Reservations: Continuing investigation and discovery may cause the Non-BW LGE/SD Plaintiffs to become aware of additional evidence or information that is relevant to these initial

WHEREFORE the Court Orders the following rolling production schedule of supplemental Rule 26(a)(1)(A)(iii) disclosures of past property damages and past increased hiring costs by the Non-BW LGE/SDs:

DATE	
February 10, 2025	Non-BW LGE/SDs on Exhibit A
March 12, 2025	Non-BW LGE/SDs on Exhibit B
April 11, 2025	Non-BW LGE/SDs on Exhibit C
May 12, 2025	Non-BW LGE/SDs on Exhibit D

WHEREFORE, the Court further Orders that the supplemental Rule 26(a)(1)(A)(iii) disclosures shall be filed through MDL Centrality.

IT IS SO ORDERED.

DATED: September 30, 2024


MAGISTRATE JUDGE: HON. PETER H. KANG

disclosures. The Non-BW LGE/SD Plaintiffs have sustained past, ongoing, and future damages. As such, the estimated approximate property damages and increased hiring costs only reflect a portion of the total damages the Non-BW LGE/SD Plaintiffs seek in this litigation. The Non-BW LGE/SDs specifically reserve all rights to amend and supplement including reserve their right to serve expert reports and/or amended disclosures which reflect different property and increased hiring costs and/or total damages numbers than those provided herein based on additional information and/or expert analysis. The Non-BW LGE/SD Plaintiffs expressly reserve the right to supplement and/or amend their supplemental disclosures, to the extent such supplementation or amendment may be required by the Federal Rules of Civil Procedure and/or based on additional information and/or expert analysis. Non-BW LGE/SD Plaintiffs hereby expressly reserve all objections to the use, for any purpose, of these initial disclosures, or any of the information referenced in their supplemental disclosures, in this consolidated action or any other proceeding. The Non-BW LGE/SD Plaintiffs incorporate by reference their Plaintiff Fact Sheets and Supplemental Plaintiff Fact Sheets, and amendments thereto. The Non-SD BW Plaintiffs expressly object to producing or making available for inspection and copying, as under Rule 34, any documents or other evidentiary material created or collected through this process that constitutes work product or which implicates the attorney-client privilege.

1 Dated: September 27, 2024

Respectfully submitted,

2 /s/ Lexi J. Hazam

3 LEXI J. HAZAM

4 **LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

5 275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: 415-956-1000
lhazam@lchb.com

7 PREVIN WARREN

8 **MOTLEY RICE LLC**

9 401 9th Street NW Suite 630
Washington DC 20004
Telephone: 202-386-9610
pwarren@motletrice.com

10 *Co-Lead Counsel*

11 CHRISTOPHER A. SEEGER

12 **SEEGER WEISS, LLP**

13 55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: 973-639-9100
Facsimile: 973-679-8656
cseeger@seegerweiss.com

16 *Counsel to Co-Lead Counsel*

17 JENNIE LEE ANDERSON

18 **ANDRUS ANDERSON LLP**

19 155 Montgomery Street, Suite 900
San Francisco, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

20 *Liaison Counsel*

21 MICHAEL M. WEINKOWITZ

22 **LEVIN SEDRAN & BERMAN, LLP**

23 510 Walnut Street
Suite 500
Philadelphia, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

26 *Co-Chair of Local Government Entity
Committee and Plaintiff Leadership Committee
Member*

27 MELISSA YEATES

28 **KESSLER TOPAZ MELTZER & CHECK,
LLP**

280 King of Prussia Road
Radnor, PA 19087
Telephone: 610-667-7706
myeates@ktmc.com

*Co-Chair of Local Government Entity
Committee*

KING & SPALDING LLP

/s/ Geoffrey M. Drake
Geoffrey M. Drake, *pro hac vice*
gdrake@kslaw.com
TaCara D. Harris, *pro hac vice*
tharris@kslaw.com
David Mattern, *pro hac vice*
dmattern@kslaw.com
King & Spalding LLP
1180 Peachtree Street, NE, Suite 1600
Atlanta, GA 30309
Telephone: (404) 572-4600
Facsimile: (404) 572-5100

**FAEGRE DRINKER BIDDLE & REATH
LLP**

/s/ Andrea Roberts Pierson
Andrea Roberts Pierson, *pro hac vice*
andrea.pierson@faegredrinker.com
Amy Fiterman, *pro hac vice*
amy.fiterman@faegredrinker.com
Faegre Drinker Biddle & Reath LLP
300 N. Meridian Street, Suite 2500
Indianapolis, IN 46204
Telephone: (317) 237-0300
Facsimile: (317) 237-1000

*Attorneys for Defendants TikTok, Inc.,
ByteDance, Inc., ByteDance Ltd., TikTok Ltd.,
and TikTok, LLC*

COVINGTON & BURLING LLP

/s/ Phyllis A. Jones
Mark W. Mosier, *pro hac vice*
mmosier@cov.com
Paul W. Schmidt, *pro hac vice*
pschmidt@cov.com
Phyllis A. Jones, *pro hac vice*
pajones@cov.com
COVINGTON & BURLING LLP

One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: (202) 662-6000
Facsimile: (202) 662-6291

Emily Johnson Henn (State Bar No. 269482)
ehenn@cov.com
COVINGTON & BURLING LLP
3000 El Camino Real
5 Palo Alto Square, 10th Floor
Palo Alto, CA 94306
Telephone: (650) 632-4700
Facsimile: (650) 632-4800

*Attorneys for Defendants Meta Platforms, Inc.
f/k/a Facebook, Inc.; Facebook Holdings, LLC;
Facebook Operations, LLC; Facebook
Payments, Inc.; Facebook Technologies, LLC;
Instagram, LLC; Siculus, Inc.; and Mark Elliot
Zuckerberg*

MUNGER, TOLLERS & OLSEN LLP

/s/ Jonathan H. Blavin
Jonathan H. Blavin (State Bar No. 230269)
Jonathan.Blavin@mto.com
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105-3089
Telephone: (415) 512-4000
Facsimile: (415) 512-4077

Rose L. Ehler (State Bar No. 296523)
Rose.Ehler@mto.com
Victoria A. Degtyareva (State Bar No. 284199)
Victoria.Degtyareva@mto.com
Ariel T. Teshuva (State Bar No. 324238)
Ariel.Teshuva@mto.com
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

Lauren A. Bell, *pro hac vice*
Lauren.Bell@mto.com
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Ave., NW,
Suite 500 E
Washington, D.C. 20001-5369
Telephone: (202) 220-1100
Facsimile: (202) 220-2300
Attorneys for Defendant Snap Inc.

**WILSON SONSINI GOODRICH & ROSATI
Professional Corporation**

/s/ Brian M. Willen

Brian M. Willen, *pro hac vice*

Wilson Sonsini Goodrich & Rosati

bwillen@wsgr.com

1301 Avenue of the Americas, 40th Floor

New York, New York 10019

Telephone: (212) 999-5800

Facsimile: (212) 999-5899

Lauren Gallo White (State Bar No. 309075)

Wilson Sonsini Goodrich & Rosati

lwhite@wsgr.com

Andrew Kramer (State Bar No. 321574)

akramer@wsgr.com

Carmen Sobczak (State Bar No. 342569)

csobczak@wsgr.com

One Market Plaza, Spear Tower, Suite 3300

San Francisco, CA 94105

Telephone: (415) 947-2000

Facsimile: (415) 947-2099

Christopher Chiou (State Bar No. 233587)

Wilson Sonsini Goodrich & Rosati

cchiou@wsgr.com

Matthew K. Donohue (State Bar No. 302144)

mdonohue@wsgr.com

633 West Fifth Street

Los Angeles, CA 90071-2048

Telephone: (323) 210-2900

Facsimile: (866) 974-7329

Attorneys for Defendants YouTube, LLC,

Google LLC, and Alphabet Inc.

L.R. 5-1 ATTESTATION

I, Geoffrey M. Drake, attest that all signatories listed herein, and on whose behalf this filing is submitted, concur in this filing's content and have authorized this filing.

By: /s/ Geoffrey M. Drake
Geoffrey M. Drake